

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA

IN RE:)	Bankruptcy Case No: 19-05555-B
)	Chapter 13
Michelle Yvette Hodges,)	
)	
)	
Debtors.)	
_____)	

**OBJECTION TO CONFIRMATION OF PLAN AND VALUATION
AND MEMORANDUM IN SUPPORT THEREOF**

Ally Financial, serviced by Ally Servicing LLC, ("Ally"), by and through its undersigned counsel, hereby objects to the confirmation of the Debtor's plan.

The basis for the objection is that the plan does not comply with 11 U.S.C. §1325(a)(5). Specifically, the proposed payments do not adequately protect the interests of Ally in the collateral, specifically, one 2016 Kia Forte, VIN # KNAFX4A69G5443516. Further, Ally is entitled to the presumed interest rate.

Additionally, the Debtor's plan does not reflect the true value of the vehicle which has a NADA retail value of \$8,575.00.

WHEREFORE, having objected to the confirmation of the Debtor's plan, Ally prays that the confirmation be denied, and the Court grant such other relief as is just and proper.

Respectfully submitted,

JOHNSON LAW FIRM, P. A.

BY:


Lawrence W. Johnson, Jr.

District Court ID 2200

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Attorney for Ally Bank

Columbia, South Carolina
January 2, 2020

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA


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DEBTOR(S).)	
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CERTIFICATE OF SERVICE

This is to certify that I, Sharal Bateman of the Johnson Law Firm, P.A., am this day serving on the persons named below the an Objection To Confirmation of Plan and Valuation and Memorandum in Support Thereof on behalf of Ally Servicing LLC servicer for Ally Financial, in this matter by placing a copy of same in the United States Mail, postage pre-paid, in envelopes addressed as follows:

Michelle Yvette Hodges
Pro Se Debtor
PO Box 95
Mauldin, SC 29662

Gretchen D. Holland (via ECF)
Chapter 13 Trustee
20 Roper Corners Circle, Suite C
Greenville, SC 29615



Sharal Bateman

Columbia, South Carolina.
January 2, 2020